





Understanding Section 504

Design it Right

**The Uniform Federal
Accessibility Standards
(UFAS)**

and the

**ADA Standards for
Accessible Design (ADA
Standards)**

Places of Public Accommodation

Under title III of the ADA, a rental office or manager's office is a *place of public Accommodation*. It should be accessible and include accessible elements and public use spaces serving the



Places of Public Accommodation

Facilities Typically Serving Rental Offices

- Public toilets serving the office (employee toilets are covered by UFAS and Section 504)
- Public parking serving the office
- Public telephones serving the office
- At least one accessible route within the boundary of the site from public transportation stops, accessible parking spaces, passenger loading zones, and public streets or sidewalks.

UFAS and ADA Standards in general...

- Specific provisions take precedence over general provisions
- Text takes precedence over figures
- Accessible furnishings, non-fixed elements, and equipment not scoped, may be required as “reasonable accommodations” or to provide program access under Section 504 of the Rehabilitation Act of 1973, or under DOJ’s ADA regulations for titles II or III

UFAS New Construction vs. Alterations

- New construction must be fully accessible
- Where a building is vacated and totally altered, it must follow new construction standards and special technical provisions unless “structurally impracticable”.
- Substantial alterations must comply with alterations standards and must

UFAS Alterations

Minimum Requirements

- Altered Elements
 - Must comply with the requirements for new construction, unless modified by 4.1.6, e.g. subject to a “special technical provision for alterations”
- Additional Requirements for Substantial Alterations
 - Must provide an accessible route and an accessible entrance
 - Altered floors must provide at least one accessible toilet and bathing facility for each sex

Public Accommodation: Alterations

Minimum Requirements

Each alteration must comply with the DOJ title III requirements for alterations and the ADA Standards

- Altered Elements
 - Must comply with the requirements for new construction, unless modified by 4.1.6 , e.g. would be technically infeasible or subject to a “special technical provision for alterations”.

Public Accommodation: Alterations Minimum Requirements

- Additional Requirements Beyond the Scope of the Original Alteration
 - Provide an accessible path of travel (including toilets, telephones, and drinking fountains) to altered area(s) of primary function, unless disproportionate to the overall cost of the alteration (20%)



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Notes on Often Overlooked Minimum Requirements for Accessible Dwelling Units

UFAS 4.34.2

UFAS Minimum Requirements

- Accessible common spaces *serving* accessible dwelling units
- Maneuvering space (T-turn or 60 inch circle) in *every* accessible space
- One accessible route connecting primary entrance and all accessible spaces
- All controls used by residents except ceiling and floor registers – think about load centers

UFAS Minimum Requirements

- One accessible full bathroom
- Bedrooms
 - One accessible bedroom in a 1 bedroom unit
 - Two accessible bedrooms where 2 or more bedrooms are provided

Note: HUD PIA may require all bathrooms and all bedrooms to be on accessible routes



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UFAS and ADA Standards

Accessible Routes

Accessible Routes Must Serve

- Site arrival points and, where provided within the site, public transportation stops, accessible parking and passenger loading zones
 - Accessible building entrances
 - Accessible public use and common use spaces
 - Accessible dwelling unit entrances

Ramps

- Slope (1:12 max.)
- Width 36 in. min.
- Landings
 - top, bottom,
intermediate
- Handrails
 - 2 sides
- Edge Protection



Parking

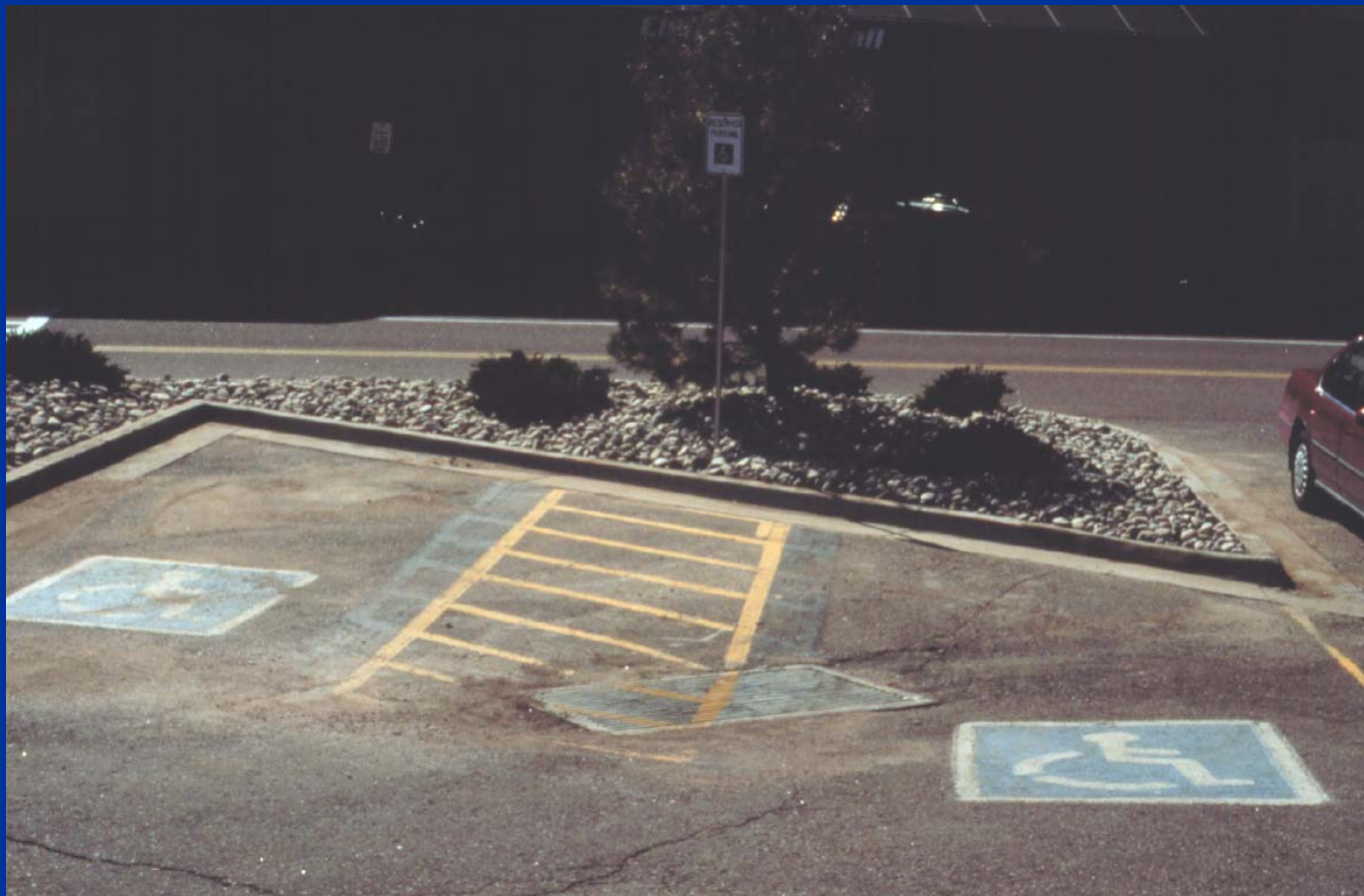
- Location: On shortest accessible route of travel from parking to an accessible entrance
- Parking spaces: At least 96 inches wide
- Access aisle: At least 60 inches wide

Access Aisle



Level (1:50) in all directions

Acceptable?



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Parking Signs



Vertical sign
“Visible above a
parked vehicle”

Dwelling Unit Parking

- Where provided for *all* residents, 1 parking space for each accessible dwelling unit
- Where provided for *some* residents, provide on request
 - *Recommendation:* at time of construction, install space, not sign, to avoid re-stripping
- 2% visitor parking

Entrances and Doors



Entrances and Doors

- Clear width (32 inches min.)
- Beveled thresholds
1/2 inch max.
sliding 3/4 inch max.
- Graspable hardware
- Opening force (5 lbf. max – interior doors)
- Automation (not req.)



Doors

Ramps, including those at doors, must have landings at top and bottom



ADA Elevators

ADA provides an exception for elevators in buildings that are under three stories or that have less than 3000 square feet per story (ADAAG 4.1.3 (5) Exception 1) unless the building is:

- A shopping center or shopping mall,
- A professional office of a healthcare provider,
- A terminal, depot, or other station used for specified public transportation
- An airport passenger terminal or,
- Other type of facility as determined by the Atty.

Elevators

UFAS 4.1.2 (5) & 4.1.3 (1))

Elevators are not required where:

- **No accessible dwelling units are located above or below the accessible level, and**
- **At least one of each type of common area and amenity provided for use of residents and visitors is available at the accessible level**



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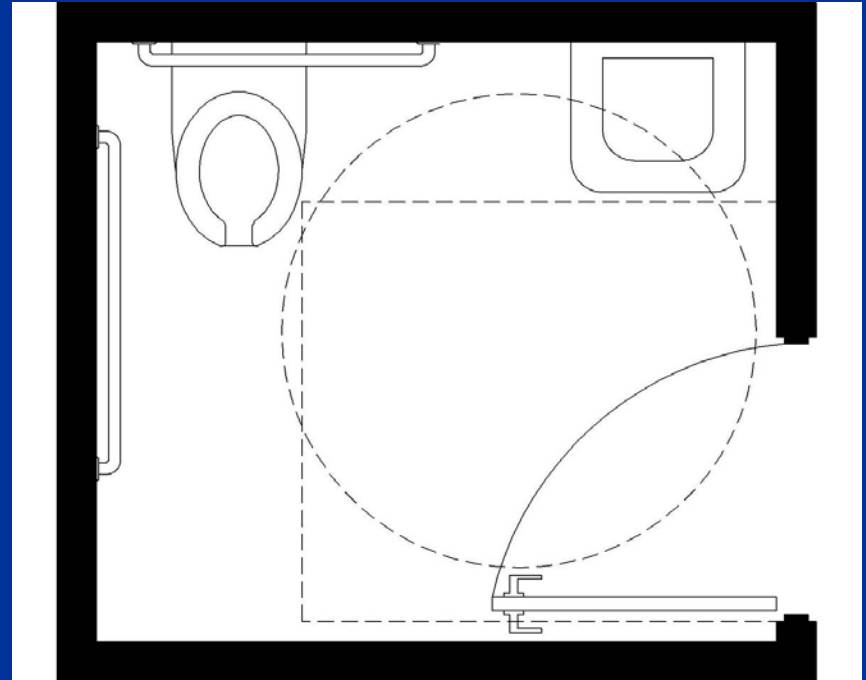
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UFAS and ADA Standards

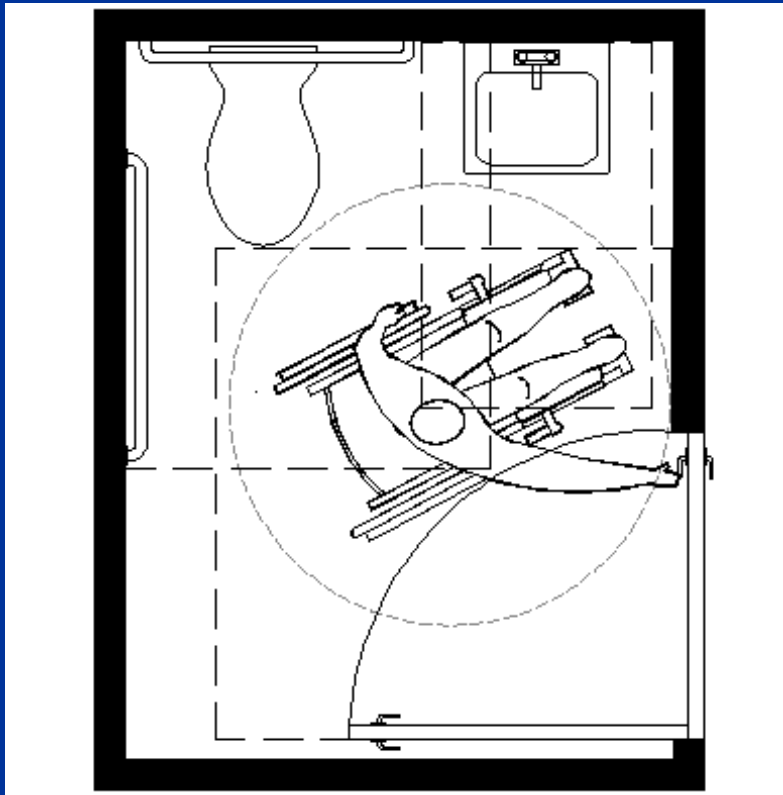
Plumbing

Toilet and Bathrooms

- Provide T-turn or 60 inch circle
 - Maneuvering clearances may overlap door swing
 - In dwellings, UFAS Exception to 4.22.2 doesn't apply



Toilet and Bathrooms



Doors cannot
swinging into
fixture
clearances

Toilet and Bathrooms

- All Controls Within Reach



Toilet and Bathrooms

- The term “common use” includes “employee only” areas
 - Employee-only facilities subject *only* to ADA’s barrier removal obligation need not be accessible
- Including in dwelling units, “adaptable” toilet rooms must meet all the spatial requirements for fully accessible toilet rooms

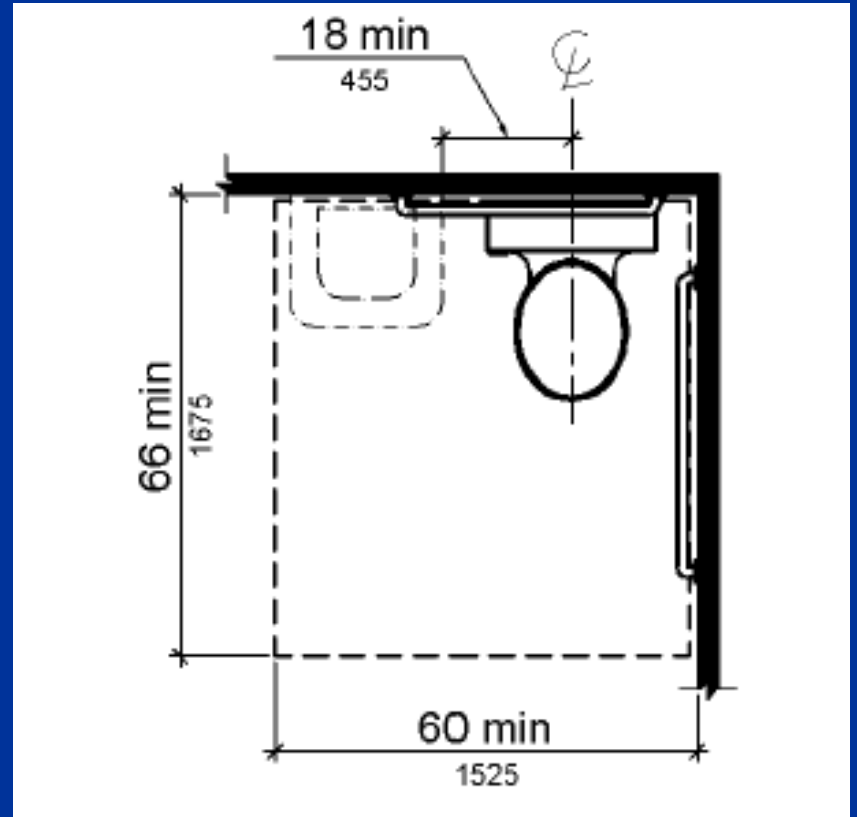
Water Closets

18 in. min
between
lavatory and
w/c

36 in. back wall
grab bar req.
by Fig. 29

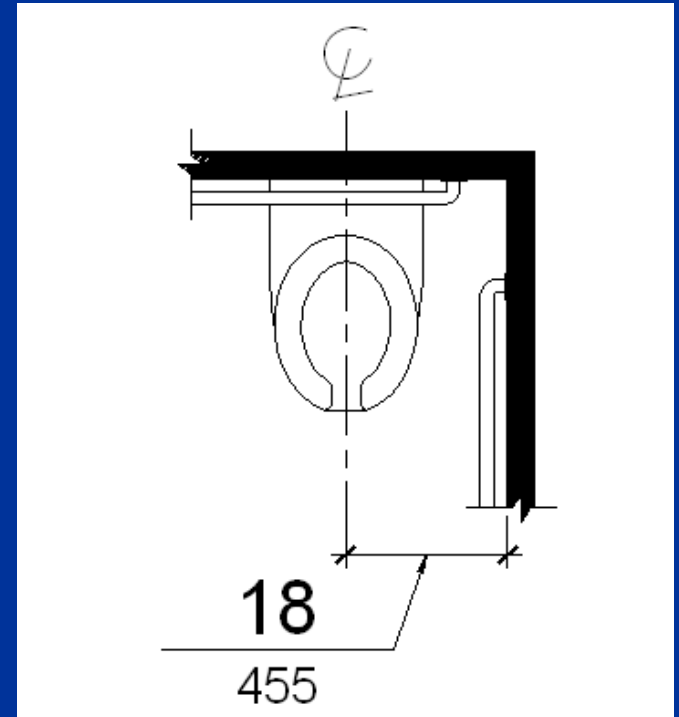
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Reinforcement
for adaptable



Water Closets

- 18 inch absolute centerline
- 17 to 19 inches high
 - 15 inches in dwelling units



Urinals

There's no such thing as a parallel approach!

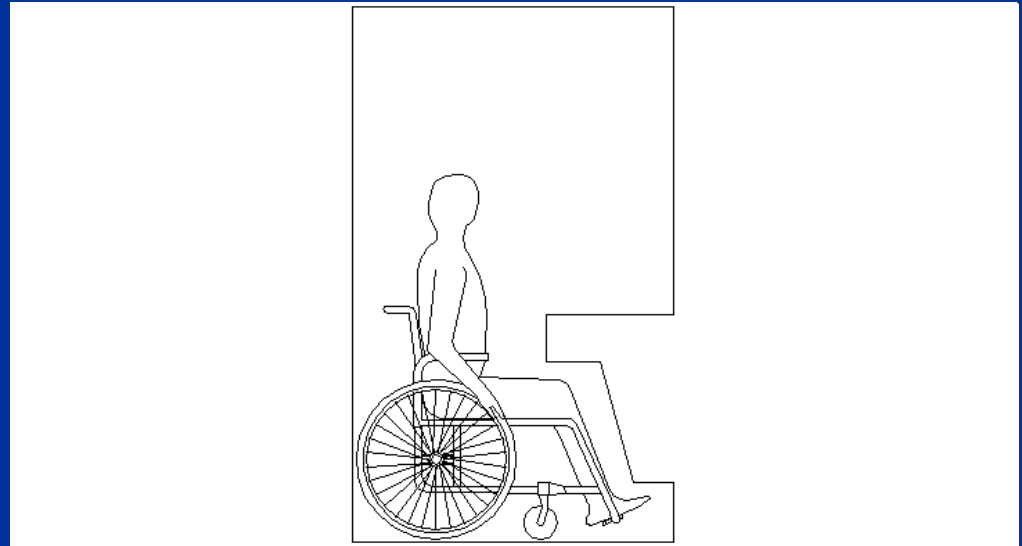


Lavatories and Sinks



Lavatories and Sinks

- 29 inches to the apron (lavs)
- Clear floor space and 19 inches maximum
- Knee and toe space



Lavatories and Sinks

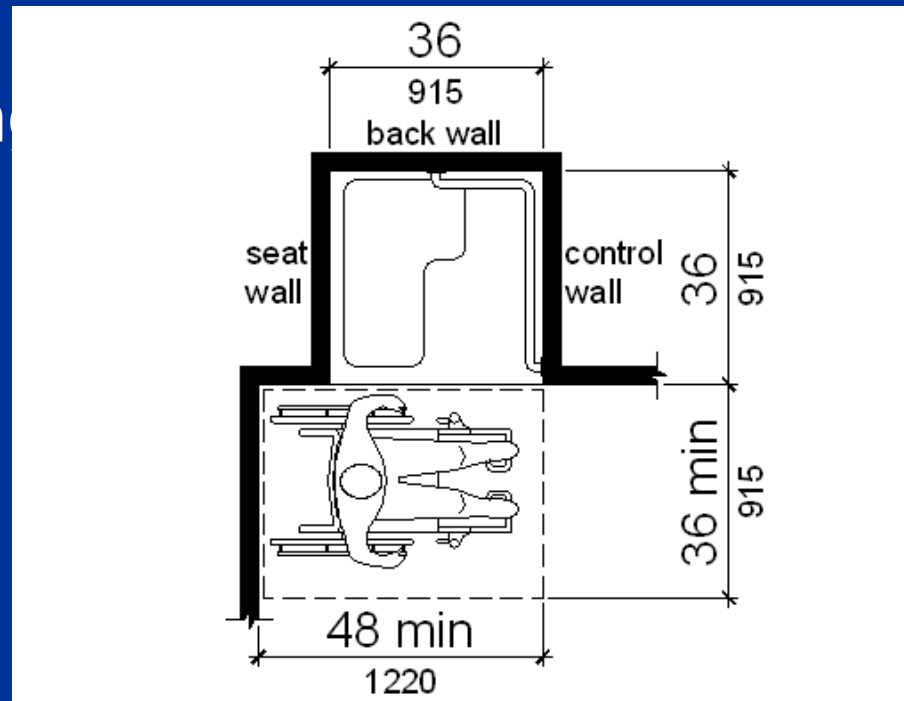
- Exposed pipes, you might as well do them all



Showers

- Transfer and Roll-in Showers

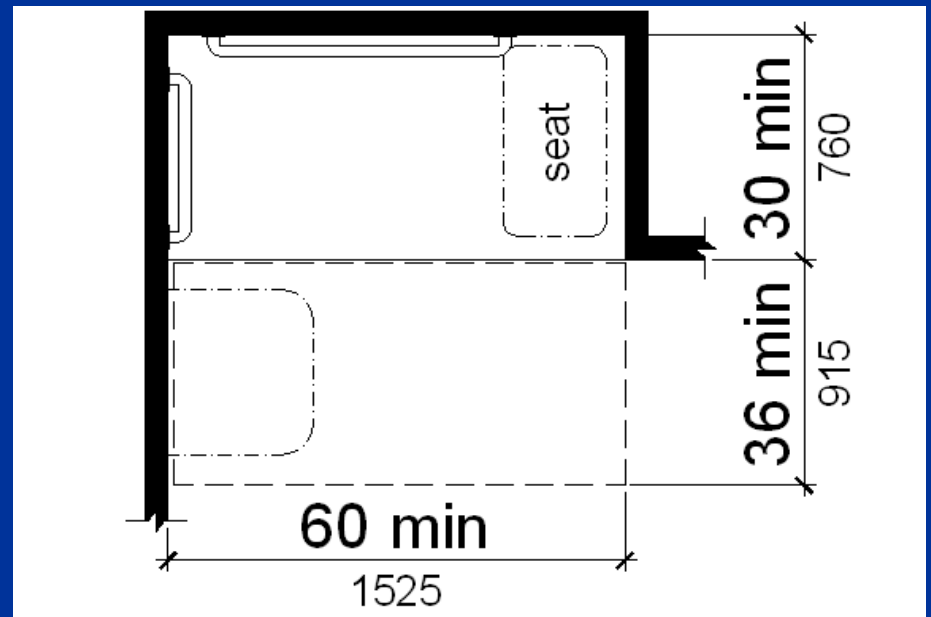
- Avoid creating an alcove



Showers

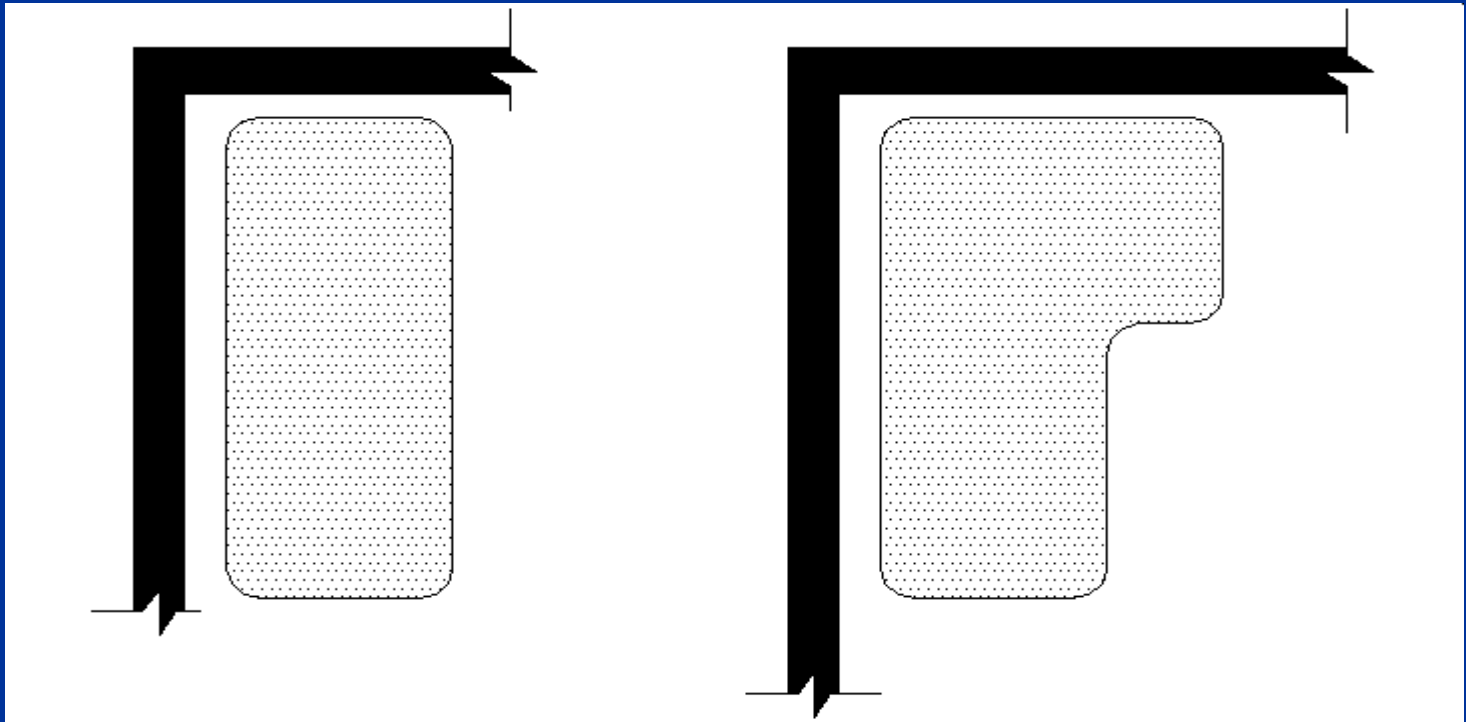
- Transfer and Roll-in Showers

- Note relative position of lav, seat, and controls



Showers

- Seat (must be provided in transfer shower)



Drinking Fountains

- Cantilevered units must provide Knee and Toe clearances AND meet the requirements for Protruding Objects.





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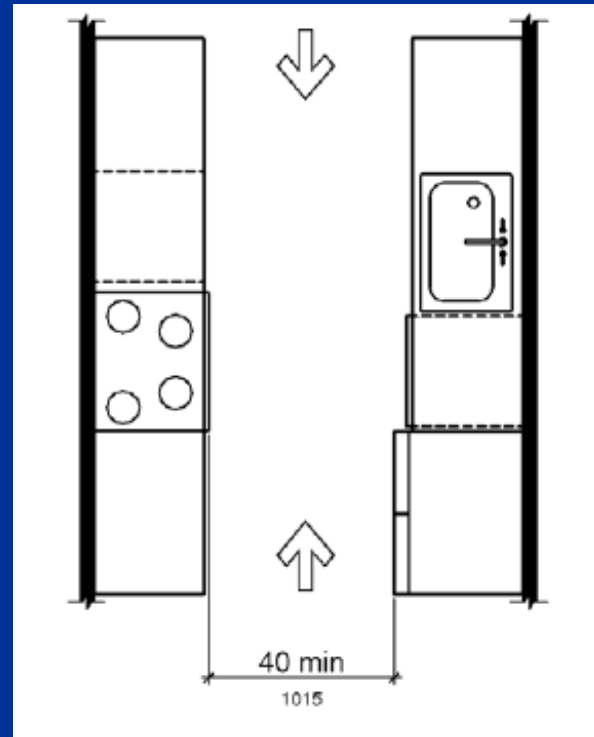
UFAS and ADA Standards

Kitchens

Kitchens

Clearances

- 40 inches min. between opposing base cabinets, counter tops, appliances, or walls
 - U-shaped, provide 60 inches min.



Clear Floor Space at *All* Provided Appliances

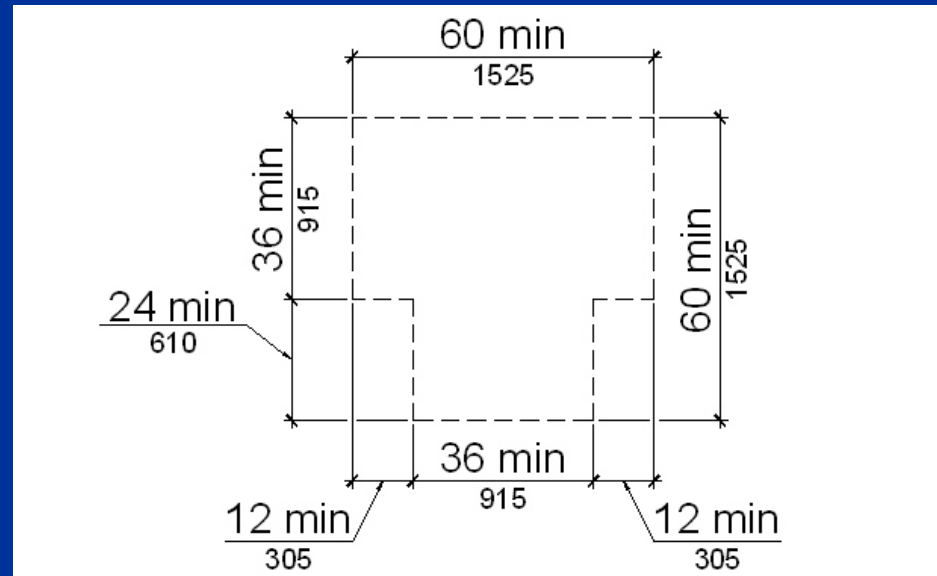
- Range
- Cook top
- Oven
- Refrigerator and freezer
- Dishwasher
- Trash compactor (what's this?)
- Microwave

Work Surface

- At least one work surface accessible or *adaptable* removable base cabinets permitted
- 30 inches long min.
- 34 in. high max. measured to work surface, or adjustable to 28, 32, and 36 in.
- Clearance, 30 in. min. wide by 48 in. min deep for a forward approach
 - 19 in. max. of clearance under work surface for knee and toe
 - No sharp surfaces under work surface

Work Surface and Maneuvering Clearances

If the work surface is 36 inches wide, instead of 30 inches, it can provide the base of a T-turn.



Ranges and Cook Tops

- Controls on ranges and cook tops
 - No reaching across burners (front or side)
- Knee space is NOT required underneath a cook top or wall oven; if provided, insulation IS required
- All kitchen controls must be within reach, including range hood controls
 - Redundant controls such as wall switches are permitted

Kitchen Storage

- Height – 48 in. max for one shelf of all cabinets and shelves above required work surface
- Hardware Placement
 - Wall cabinets – On bottom
 - Base cabinets – At top
- *Recommendation:* Provide pantry-style storage and pull-out shelves



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ADA and ABA Accessibility Guidelines

Recreation and Play



Recreation Facilities (Chapter 10)

- Amusement rides
- Recreational boating facilities
- Exercise machines
- Fishing piers and platforms
- Golf facilities
- Miniature golf facilities
- Play areas
- Swimming pools, wading pools, and spas
- Shooting facilities with firing



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